

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO DAVID POPKIN INTERROGATORIES DBP/USPS-36 THROUGH 38**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of David Popkin dated August 15, 2011. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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DBP/USPS-36 Tables 1 and 2 of the Testimony show a truncated y- or vertical axis. Please provide a table with the same data except with the y- or vertical axis going all the way down to zero.

RESPONSE

No. Reasonable readers of both Tables clearly understand that the trend lines are fairly represented without reconfiguring the Tables to take three to four times as much space on each page.

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- [a] Are there presently any plans to add facilities to the listing of those facilities already provided for study for discontinuance or consolidation?
- [b] If so, when will the listing be provided and under what circumstances will these new facilities be added?
- [c] If not, how long is it believed that it will be before new facilities will be added?
- [d] Please define the terms discontinuance and consolidation and provide an explanation under which each of them will be utilized.

RESPONSE

- (a) No.
- (b) N/A
- (c) The criteria that define the facilities within the scope of the RAO Initiative RAO Initiative are explained in USPS-T-1 at pp. 14-17, as clarified on August 16, 2011.
- (d) The terms are defined clearly in USPS Handbook PO-101, sections 233.1 and 232.1, respectively. Discontinuance is the only option being explored under the RAO Initiative. Either could be used under circumstances unrelated to, beyond the scope of and irrelevant to the RAO Initiative.

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The Englewood NJ Post Office Annex 07631 is on the list of facilities being studied. There are at least four functions being conducted at that facility, namely: retail sales, post office boxes, carrier annex, mail dispatching to/from the P&DC.

- [a] Are there any other functions being conducted at this facility?
- [b] Which of the four or more functions being conducted at the facility are being studied for discontinuance or consolidation?

RESPONSE

- (a) The only activities relevant to the RAO Initiative under review in this docket that are listed in the preamble of this interrogatory are retail sales and Post Office box delivery.
- (b) The RAO Initiative is focused on the discontinuance of operations referenced in the response to subpart (a).